

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CONSUMER FINANCIAL PROTECTION  
BUREAU, THE PEOPLE OF THE STATE  
OF NEW YORK, BY LETITIA JAMES,  
ATTORNEY GENERAL OF THE STATE  
OF NEW YORK, STATE OF COLORADO,  
ex rel. PHILIP J. WEISER, ATTORNEY  
GENERAL, STATE OF DELAWARE, ex  
rel. KATHLEEN JENNINGS, ATTORNEY  
GENERAL, STATE OF DELAWARE, THE  
PEOPLE OF THE STATE OF ILLINOIS,  
through ATTORNEY GENERAL KWAME  
RAOUL, THE STATE OF MINNESOTA, by  
its ATTORNEY GENERAL, KEITH  
ELLISON, THE STATE OF NORTH  
CAROLINA, ex rel. JOSHUA H. STEIN,  
ATTORNEY GENERAL, THE STATE OF  
WISCONSIN,

Plaintiffs,

v.

STRATFS, LLC (F/K/A STRATEGIC  
FINANCIAL SOLUTIONS, LLC),  
STRATEGIC CLIENT SUPPORT, LLC  
(F/K/A PIONEER CLIENT SERVICES,  
LLC), STRATEGIC CS, LLC, STRATEGIC  
FS BUFFALO, LLC, STRATEGIC NYC,  
LLC, BCF CAPITAL, LLC, T FIN, LLC,  
STRATEGIC CONSULTING, LLC,  
VERSARA LENDING, LLC, STRATEGIC  
FAMILY, INC., ANCHOR CLIENT  
SERVICES, LLC (NOW KNOWN AS CS 1  
PAAS SERVICES, LLC), BEDROCK  
CLIENT SERVICES, LLC, BOULDER  
CLIENT SERVICES, LLC, CANYON

Misc. Case No. 1:24-mc-215

**NOTICE OF ORDER  
APPOINTING RECEIVER  
PURSUANT TO 28 U.S.C.  
§ 754**

United States District Court  
Western District of New York  
Case No. 1:24-cv-00040-EAW-  
MJR

**FILED**  
**HARRISBURG, PA**

**MAR 15 2024**

PER JBL  
DEPUTY CLERK

CLIENT SERVICES, LLC, CAROLINA  
CLIENT SERVICES, LLC, GREAT LAKES  
CLIENT SERVICES, LLC, GUIDESTONE  
CLIENT SERVICES, LLC, HARBOR  
CLIENT SERVICES, LLC, HEARTLAND  
CLIENT SERVICES, LLC, MONARCH  
CLIENT SERVICES, LLC (NOW KNOWN  
AS CS 2 PAAS SERVICES, LLC),  
NEWPORT CLIENT SERVICES, LLC,  
NORTHSTAR CLIENT SERVICES, LLC,  
OPTION 1 CLIENT SERVICES, LLC,  
PIONEER CLIENT SERVICING, LLC,  
ROCKWELL CLIENT SERVICES, LLC,  
ROYAL CLIENT SERVICES, LLC,  
STONEPOINT CLIENT SERVICES, LLC,  
SUMMIT CLIENT SERVICES, LLC (NOW  
KNOWN AS CS 3 PAAS SERVICES, LLC),  
WHITESTONE CLIENT SERVICES, LLC,  
RYAN SASSON, JASON BLUST, and  
UNIDENTIFIED JOHN DOES 1-50,

Defendants, and

DANIEL BLUMKIN, ALBERT IAN  
BEHAR, STRATEGIC ESOP, STRATEGIC  
ESOT, TWIST FINANCIAL, LLC, DUKE  
ENTERPRISES, LLC, BLAISE  
INVESTMENTS, LLC, THE BLUST  
FAMILY IRREVOCABLE TRUST  
THROUGH DONALD J. HOLMGREN,  
TRUSTEE, JACLYN BLUST, LIT DEF  
STRATEGIES, LLC, and RELIALIT, LLC,

Relief Defendants.

**NOTICE OF ORDER APPOINTING RECEIVER  
PURSUANT TO 28 U.S.C. § 754**

United States District Court for the Western District of New York  
Case No. 1:24-cv-00040-EAW-MJR

On January 10, 2024, the Consumer Financial Protection Bureau, the People  
of the State of New York, by Letitia James, Attorney General of the State of New  
York, State of Colorado, *ex rel.* Philip J. Weiser, Attorney General, State of  
Delaware, *ex rel.* Kathleen Jennings, Attorney General, State of Delaware, the

People of the State of Illinois, through Attorney General Kwame Raoul, the State of Minnesota, by its Attorney General, Keith Ellison, the State of North Carolina, *ex rel.* Joshua H. Stein, and Attorney General, the State of Wisconsin, filed a Complaint for Injunctive Relief, Restitution, and Civil Money Penalties in the United States District Court for the Western District of New York, Case No. 1:24-cv-00040-EAW-MJR. Attached hereto as Exhibit A is a true and correct copy of the Complaint.

The Court-appointed receiver, Thomas W. McNamara ("Receiver"), by and through the undersigned counsel, hereby provides notice, pursuant to 28 U.S.C. § 754, that on March 4, 2024, the Court entered a Preliminary Injunction, appointing Mr. McNamara as Receiver over the Receivership Defendants (Preliminary Injunction, Section VIII, page 17). A true and correct copy of the Preliminary Injunction is attached hereto as Exhibit B.

Respectfully submitted this 13th day of March, 2024.

MCNAMARA SMITH LLP

By: Logan D. Smith

Logan D. Smith (Cal. Bar No. 212041)

McNamara Smith LLP

655 West Broadway, Suite 900

San Diego, California 92101

Tel.: 619-269-0400

lsmith@mcnamarallp.com

*Attorneys for Court-appointed Receiver,*

*Thomas W. McNamara*

**EXHIBIT INDEX**

- Exhibit A            Complaint for Injunctive Relief, Restitution, and Civil Money Penalties, *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*, Case No. 1:24-cv-00040-EAW-MJR (W.D.N.Y.)
- Exhibit B            Preliminary Injunction, *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*, Case No. 1:24-cv-00040-EAW-MJR (W.D.N.Y.)



LOGAN D. SMITH  
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March 13, 2024

*Via FedEx (7755-3252-0610)*

Clerk's Office  
U.S. District Court  
Middle District of Pennsylvania  
Sylvia H. Rambo  
United States Courthouse  
1501 North 6th Street  
Harrisburg, PA 17102

Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*  
U.S. District Court (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR  
Miscellaneous Case Filing re: Notice of Order Appointing Receiver  
Pursuant to 28 U.S.C. § 754

Dear Sir/Madam:

Enclosed are the originals and caption pages of the Notice of Order Appointing Receiver Pursuant to 28 U.S.C. § 754 and Civil Cover Sheet for filing with the U.S. District Court for Middle District of Pennsylvania, along with our check in the amount of \$52 for the Miscellaneous case filing fee. Please file the originals and conform the extra caption pages, returning the conformed copies to me in the enclosed self-addressed, postage-paid envelope.

If you have any questions, please call me at 619-269-0491.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'JH Jacobs'.

JH Jacobs  
Legal Assistant to Logan D. Smith

:jej  
Enclosures



## U.S. District Court

### Pennsylvania Middle - Harrisburg

Receipt Date: Mar 15, 2024 1:11PM

MCNAMARA SMITH LLP  
555 W BROADWAY STE 900  
SAN DIEGO, CA 92101

Rcpt. No: 111102004

Trans. Date: Mar 15, 2024 1:11PM

Cashier ID: #AA

CD	Purpose	Case/Party/Defendant	Qty	Price	Amt
205	Miscellaneous Filing Fees	DPAM124MC000215	1	52.00	52.00

CD	Tender		Amt
CH	Check	#3838 03/13/2024	\$52.00
Total Due Prior to Payment:			\$52.00
Total Tendered:			\$52.00
Total Cash Received:			\$0.00
Cash Change Amount:			\$0.00

Only when the bank clears the check, money order, or verifies credit of funds, is the fee or debt officially paid or discharged. A \$53 fee will be charged for a returned check.